

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**-vs-**

**Civil No. 5:13-CV-1090  
( GLS/TWD )**

**All Funds Located in Banca Popolare FriulAdria  
Account Number 70451 in the Name of  
Senol Taskin,**

**Defendant.**

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**VERIFIED COMPLAINT OF FORFEITURE IN REM**

Plaintiff, United States of America, by its attorneys, Richard S. Hartunian, United States Attorney for the Northern District of New York, and Geoffrey J. L. Brown, Assistant United States Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure.

**NATURE OF ACTION**

1. This is an action to forfeit and condemn to the use and benefit of the United States of America the following property: All Funds Located in Banca Popolare FriulAdria Account Number 70451 in the Name of Senol Taskin involved in violations of 18 U.S.C. § 1343, wire fraud, and 18 U.S.C. § 1349, conspiracy to commit wire fraud.

**THE DEFENDANT IN REM**

2. The defendant consists of all funds located in Banca Popolare FriulAdria Account Number 70451 in the name of Senol Taskin (“defendant bank account”). The Defendant bank account is located in Udine, Italy.

### **JURISDICTION AND VENUE**

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant bank account. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant bank account under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(C).

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, because the acts or omissions giving rise to the forfeiture occurred in this district, and, pursuant to 28 U.S.C. § 1395(c), which provides that a civil proceeding for the forfeiture of property seized outside any judicial district may be prosecuted in any district into which the property is brought.

### **BASIS FOR FORFEITURE**

6. The defendant bank account is subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), which pertains to any property, real or personal, representing the proceeds of a violation of 18 U.S.C. § 1343, wire fraud, and 18 U.S.C. § 1349, conspiracy to commit wire fraud.

### **FACTS**

7. The facts alleged in this complaint are based upon information and belief, the sources of which are reports from the Federal Bureau of Investigations (“FBI”) and

other written and oral information officially received by the Office of the United States Attorney for the Northern District of New York from both federal and local law enforcement agencies.

8. On October 3, 2000, Bruce Kane formed an investment partnership under the name Global Financial Fund 8, LLP (“GFF8”) in the State of Nevada. In November of 2000, GFF8 entered into a management agreement with Aspire Management, run by Sonia Novick.

9. Between late 1999 until March 2001, GFF8 solicited and received investments of approximately 10.3 million dollars from the following investors:

- (a) Larry Baum \$100,000.00;
- (b) William Edelman \$100,000.00;
- (c) Gary Goldberg \$160,000.00;
- (d) Peter Schug \$200,000.00;
- (e) Scott Steelman \$100,000.00;
- (f) Stanley Goldberg \$200,000.00;
- (g) Thomas O’Rourke \$100,000.00;
- (h) Thaler Goldberg, PTRS \$300,000.00;
- (i) Uncommon Wealth Fund, LLC \$1,000,000.00;
- (j) Jerry Hathaway \$100,000.00;
- (k) Anthony Plotkin \$890,000.00,
- (l) Heartland Systems Co. \$1,500,000.00;
- (m) Rob Mabary \$100,000.00;
- (n) World Wide Sanity, LTD \$100,000.00;

- (o) Berbrook, LTD \$5,000,000.00,
- (p) Iraklis Prokopokis \$150,000.00;
- (q) Harold Carpenter \$100,000.00; and
- (r) Bruce Kane \$100,000.00.

10. In February 2001, GFF8 and Bruce Kane entered into an agreement with Transglobal Financial Services (“TFS”), a company owned and operated by Burton Greenberg (“Greenberg”) and Senol Taskin (“Taskin”). The agreement was for the management of GFF8 Funds and specifically stated that all funds provided to TFS by GFF8 will be maintained only in United States banks or in accounts established at major brokerage firms in the United States.

11. In March of 2001, GFF8, at the direction of TFS, transferred \$10,000,000.00 to the Banca Popolare in Italy to an account in the name of GFF8. From March 2001 through March 2003, minor transfers of money were made from this account, and the majority of those transfers were used to pay personal expenses of Bruce Kane, and Sonia Novick, a Managing Partner. From March 2003 through June 2003, Bruce Kane transferred the remaining \$9,400,000.00 from this account to a GFF8 account maintained at Fleet National Bank in the United States.

12. In August of 2003, Bruce Kane opened a bank account under his name with TD Bank in Canada. He subsequently transferred the \$9,400,000.00 from the Fleet National Bank account in the name of GFF8 into the TD Bank account.

13. In September 2003, Bruce Kane executed a Power of Attorney with Taskin granting Taskin authority to transfer monies from his bank accounts.

14. In October of 2003, Taskin transferred \$7,400,000.00 from Kane’s TD

Bank account into an account maintained at TD Bank in the name of Maulyn Trading, a company owned and operated by Taskin. In addition to the GFF8 monies, Taskin also obtained an investment of \$4,190,000.00 from Chu Sing Chang (“Chang”). This investment was deposited to the Maulyn Trading TD Bank account.

15. In May of 2004, Taskin transferred approximately \$10,100,000.00 of GFF8 and Chang’s funds to Banca Popolare FriulAdria account number 70451, the defendant bank account, which is maintained in the name of Senol Taskin. The following is a summary of known transactions for this account:

<b>Summary of Transactions to and from Banca Popolare FriulAdria Account Number 70451</b>			
<b>Date</b>	<b>Amount Added or Withdrawn</b>	<b>Balance</b>	<b>Event</b>
5/13/2004	\$0.00	\$0.00	Account opened by Senol Taskin
5/20/2004	\$10,100,000.00	\$10,100,000.00	TD Bank transfer from Maulyn International Trading
6/4/2004	\$100,000.00	\$10,200,000.00	TD Bank transfer from Maulyn International Trading
6/4/2004	\$200,000.00	\$10,400,000.00	HSBC Bank transfer from Maulyn International Trading
7/4/2004	(\$25,000.00)	\$10,375,000.00	Transfer to Bruce Kane, TD Bank Account #: 1284-7303246
7/27/04 – 8/25/04	(\$49,873.00)	\$10,325,127.00	Transfer to Leung Woon Chun, DSB Bank Account #: 8380152390
9/15/2004	(\$20,017.00)	\$10,305,110.00	Transfer to Ayse Sen, TD Bank Account #: 039871121890
8/25/04 – 10/13/04	(\$340,218.00)	\$9,964,892.00	Transfer to M&P Global Financial Services, Wachovia Bank
9/9/04 – 9/27/04	(\$8,001,565.00)	\$1,963,327.00	Transfer to REFCO LLC, Fleet National Bank
10/15/04 – 10/18/04	(\$250,147.00)	\$1,713,180.00	Transfer to Serfin Taskin, AKABANK T.A.S. Istanbul

16. A review of payments made to the original GFF8 investors listed above, reflects repayment of \$1,005,797.63 out of the \$10,300,000.00 invested. The majority of the investors’ funds have been illegally misappropriated and spent by Bruce Kane, Senol Taskin and Burton Greenberg.

17. The currency in the defendant bank account was primarily derived from investors in the GFF8 partnership. Since at least 2006, and continuing to the present, Bruce Kane and Burton Greenberg have told the GFF8 investors that their collective \$10,000,000.00 investment is on deposit in an account at Banca Popolare FriulAdria. These investors have also been told that the Italian Government has seized the entire \$10,100,000.00.

18. The defendant bank account has been frozen by the Italian Government since November 2004. Approximately \$1,700,000.00 currently remains in the defendant bank account, and is maintained in the name of Senol Taskin.

**POTENTIAL CLAIMANTS**

19. Upon information and belief, the following persons who may claim an interest in the defendant bank account are not in military service, are not infants and are not incompetent persons, and are as follows:

***Bruce Kane  
4710 NE 29<sup>th</sup> Avenue  
Fort Lauderdale, Florida***

***Senol Taskin  
105 Burloak Road  
Oakville, Canada, L6L6E8***

***Burton Greenberg  
9750 NW 10<sup>th</sup> Street  
Plantation, FL 33322***

**International Investors**

***Berbrook, Ltd.  
3 Stone Building  
Lincolns Inn  
London WC2D 3XL, UK***

*Iraklis Prokopakis  
57 Akti Miaouli 18536  
Piraeus, Greece*

**Domestic Investors**

*Harold Carpenter  
13801 Bay Hill Drive  
Clive, Iowa 50325*

*2905 Gulf Shore Blvd. N.  
Apt. 803  
Naples, FL 34103-3963*

*Heartland Systems, Co.  
Attn: John Carpenter  
15210 S. 16<sup>th</sup> Place  
Phoenix, AZ 85048*

*Scott Steelman  
20 Esty Drive  
Ithaca, New York*

*Gary Goldberg  
82 Compo Road North  
Westport, CT 06880*

*S&S Partners  
Attn: Stanley Goldberg  
P.O. Box 459  
Ithaca, NY 14851*

*The Howell Foundation  
529 S. Flagler Drive #23-H  
West Palm Beach, FL 33401*

*Thaler/Howell Foundation  
Attn: Manley Thaler  
700 N. Olive Ave.  
W. Palm Beach, FL 33401*

*Jerry Hathaway  
P.O. Box 131644  
Carlsbad, CA 92013*

*Jerry Hathaway  
P.O. Box 3602  
Los Altos, CA 94024-0602*

*Rob Mabary  
1414 Outer Market Road  
Castle Rock, CO 80108*

*Rob Mabary  
10265 Dowling Ct.  
Highlands Ranch, CO 80126-4768*

*Thomas O'Rourke  
10 Twin Glens Road  
Ithaca, NY 14850*

*Schug Family Partners  
Attn: Peter N. Schug  
1 Penny Lane  
Dryden, NY 13053*

*Grainaissance, Inc.  
Attn: Anthony Plotkin  
1580 62<sup>nd</sup> Street  
Emeryville, CA 64608*

*Uncommon Wealth Fund, LLC  
981 Machen Lane  
Gilmer, TX 75644*

*West Bank  
1601 22<sup>nd</sup> Street  
W. Des Moines, IA 50265*



**WHEREFORE**, the United States of America prays that process of issue in due form of law, according to the course of this Court in actions *in rem*, against the defendant bank account and that a warrant issue for the arrest of the defendant as more particularly described herein; that all persons having any interest therein be cited to appear herein and answer the complaint; that a judgment be entered declaring the defendant condemned and forfeited to the United States of America for disposition in accordance with law; that the costs of this suit be paid to and recovered by the United States of America; and that the United States be granted such other and further relief as this Court may deem just and proper.

**Dated: September 4, 2013**

**UNITED STATES OF AMERICA  
RICHARD S. HARTUNIAN  
Northern District of New York  
U.S. Courthouse and Federal Building  
100 South Clinton Street  
Syracuse, New York, 13261  
(315) 448-0672**

By: */s/ Geoffrey J.L. Brown*

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**Geoffrey J.L. Brown  
Assistant U. S. Attorney  
Bar Roll No. 513495**


**VERIFICATION**

STATE OF NEW YORK            )  
  ) SS:  
COUNTY OF TOMPKINS        )

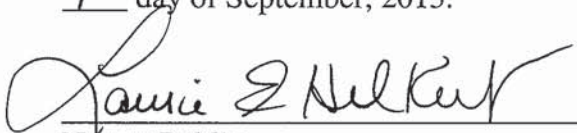
**Special Agent Joel G. Mercer**, being duly sworn, deposes and states:

I am a Special Agent with the Federal Bureau of Investigations. I have read the foregoing Complaint for Forfeiture and assert that the facts contained therein are true to the best of my knowledge and belief, based upon knowledge possessed by me and/or on information received from other law enforcement officers.

Dated: 09/04/2013

  
\_\_\_\_\_  
Special Agent Joel G. Mercer  
Federal Bureau of Investigations

Sworn to before me this  
4<sup>th</sup> day of September, 2013.

  
\_\_\_\_\_  
Notary Public

**LAURIE E HILKERT**  
**Notary Public - State of New York**  
**No. 01HI6012323**  
**Qualified in Tompkins County**  
**My Commission Expires August 24, 2014**